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12 Attorneys for Defendants
13 ELON MUSK and TESLA, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 AARON GREENSPAN,

18 Plaintiff,

19 v.

20 OMAR QAZI, SMICK ENTERPRISES,
21 INC., ELON MUSK, and TESLA, INC.,

22 Defendants.

Case No. 3:20-cv-03426-JC

**STIPULATED REQUEST AND [PROPOSED]
ORDER ISO JOINT ADMINISTRATIVE
MOTION TO INCREASE PAGE LIMITS
FOR BRIEFING ON DEFENDANTS'
MOTION TO DISMISS**

(CIV. L.R. 7-11)

Judge: The Hon. James Donato

Date Action Filed: May 20, 2020

1 Pursuant to Civil Local Rule 7-11, Defendants Tesla, Inc. (“Tesla”) and Elon Musk (together,
2 “Tesla Defendants”), through their respective attorneys, and Plaintiff Aaron Greenspan (“Plaintiff,”
3 and together with the Tesla Defendants, the “Parties”) hereby stipulate to extend the page limits for
4 both Parties in connection with briefing on the Tesla Defendants’ anticipated motion to dismiss the
5 First Amended Complaint (Dkt. 20) (“FAC”), as follows:

6 WHEREAS, on May 20, 2020 (Dkt. 1), Plaintiff filed his Complaint in this matter;

7 WHEREAS, on July 2, 2020 (Dkt. 20), Plaintiff filed his FAC;

8 WHEREAS, the Tesla Defendants believe it would be more efficient for the Court and the
9 Parties for them to file a single, consolidated motion to dismiss the FAC, rather than to respond
10 individually;

11 WHEREAS, Item No. 18 in the Court’s Standing Order for Civil Cases Before Judge James
12 Donato (“Standing Order”) provides that opening and opposition briefs may not exceed 15 pages,
13 and reply briefs may not exceed 10 pages, except for class certification and summary judgment
14 motions;

15 WHEREAS, under Civil Local Rule 7-11, parties may file a motion for administrative relief,
16 accompanied by a stipulation under Civil Local Rule 7-12, to request that the Court extend
17 applicable page limits;

18 WHEREAS, due to the length of the FAC, the number of allegations against and regarding
19 the Tesla Defendants, the volume of exhibits, and the number of different claims against the Tesla
20 Defendants, the Tesla Defendants submit that, to fully and adequately brief the issues raised in the
21 FAC, they would need at least 25 pages for a joint opening brief on their motion to dismiss and 15
22 pages on reply;

23 WHEREAS, Plaintiff is amenable to extending page limits for both sides, on the terms jointly
24 proposed in this Stipulation; and

25 **NOW THEREFORE**, pursuant to Civil Local Rule 7-11, the Parties jointly stipulate and
26 respectfully request that the Court enter an order that the page limits for briefing on the Tesla
27 Defendants’ anticipated motion to dismiss shall be extended to 25 pages for the Tesla Defendants’
28 opening brief, 25 pages for Plaintiff’s opposition, and 15 pages for the Tesla Defendants’ reply.

1 Respectfully submitted,
2 Dated: July 10, 2020 TESLA, INC.
3 By: /s/ Aarti Reddy
4 Aarti Reddy
5 Attorneys for Defendants
6 Tesla, Inc. and Elon Musk
7

8 Dated: July 10, 2020 AARON GREENSPAN
9 By: /s/ Aaron Greenspan
10 Aaron Greenspan
11

12 **ATTESTATION PURSUANT TO CIV. L.R. 5-1(i)(3)**

13 Pursuant to Civ. L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has
14 been obtained from the signatory.

15 Dated: July 10, 2020 By: /s/ Aarti Reddy
16 Aarti Reddy
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18
19

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
21

22 Dated: _____
23 The Honorable James Donato
24 United States District Judge
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1 **PROOF OF SERVICE**

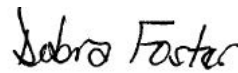
2 I am a citizen of the United States and a resident of the State of California. I am employed
3 in San Francisco County, State of California, in the office of a member of the bar of this Court, at
4 whose direction the service was made. I am over the age of eighteen years, and not a party to the
5 within action. My business address is Cooley LLP, 101 California Street, 5th Floor, San Francisco,
6 California 94111-5800, and my email address is dfoster@cooley.com. On the date set forth
7 below, I served the document described below in the manner described below:

8 **STIPULATED REQUEST AND [PROPOSED] ORDER ISO JOINT ADMINISTRATIVE MOTION**
9 **TO INCREASE PAGE LIMITS FOR BRIEFING ON DEFENDANTS' MOTION TO DISMISS**

10 X (BY ELECTRONIC MAIL) I am personally and readily familiar with the business
11 practice of Cooley LLP for the preparation and processing of documents in
12 portable document format (PDF) for e-mailing, and I caused said document to be
13 prepared in PDF and then served by electronic mail to the party listed below.

14 Omar Qazi
15 Smick Enterprises, Inc.
16 22909 Audrey Avenue
17 Torrance, CA 90505
18 Email: omar@smick.com

19 I declare under penalty of perjury under the laws of the State of California that the above is
20 true and correct. Executed on July 10, 2020 at San Francisco, California.

21 

22 _____
23 Debra Foster
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